

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
TYLER DIVISION**

PARITY NETWORKS, LLC,

§

Plaintiff,

§

v.

§ Civil Action No. 6:17-cv-00495-RWS

JUNIPER NETWORKS, INC.,

§ JURY TRIAL DEMANDED

Defendant.

§

UNOPPOSED MOTION TO FILE UNDER SEAL

Plaintiff Parity Networks, LLC (“Parity”), by its undersigned counsel hereby moves this Court to order Plaintiff’s Response to Opposition to Juniper Networks, Inc.’s Motion to Transfer (“Response”) and all exhibits thereto (“Exhibits”) to be filed under seal. The Response and Exhibits contain confidential material relating to Defendant’s business operation and/or employees. As grounds for this motion, Plaintiff states as follows:

1. The Response references Defendant’s employees.
2. The document produced by Defendant bearing the Bates number JUN-VENUE-00000007-0000009, Exhibit 1 to the Response, was produced by Defendant under a “Confidential—Attorneys’ Eyes Only” designation.
3. Parity therefore respectfully requests that this Court order the Response and Exhibits to be filed under seal.

Dated: May 4, 2018

Respectfully submitted,

/s/ Andrew G. DiNovo

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***COUNSEL FOR PLAINTIFF
PARITY NETWORKS, LLC***

CERTIFICATE OF CONFERENCE

I hereby certify that on May 4, 2018, I conferred via email with counsel for Defendant Juniper Networks, Inc., and confirmed that this Motion is unopposed.

/s/ Andrew G. DiNovo _____
Andrew G. DiNovo

CERTIFICATE OF SERVICE

The undersigned certifies that the foregoing document was filed electronically in compliance with Local Rule CV-5(a). As such, this document was served on all counsel who are deemed to have consented to electronic service. Local Rule CV-5(a)(3)(A). Pursuant to FED. R. CIV. P. 5(d) and Local Rule CV-5(d) and (e), all other counsel of record not deemed to have consented to electronic service were served with a true and correct copy of the foregoing by email on May 4, 2018.

/s/ Andrew G. DiNovo _____
Andrew G. DiNovo